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December 8, 2022

By ECF

Hon. Sankat J. Bulsara, U.S.M.J.
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Li v. Moon Mode Design Fashion, Inc. et al.
22 Civ. 00793 (HG)(SJB)

Dear Judge Bulsara:

I, along with Brian “Geno” Nettle, of Nettle Law, represent Nai He Li, Plaintiff in the above-referenced lawsuit. I write to request a third extension of time by which Plaintiff must serve two of the individual defendants in this case.

Despite the Court’s order granting Plaintiff an extension until December 9, 2022, to serve the Amended Complaint upon Jane and John Doe, Defendants Moon Mode Design Fashion, Inc. (“Moon Mode”) and Chiu Pin Low have not responded to Plaintiff’s Interrogatories seeking information about John Doe and Jane Doe. I have communicated with counsel for these defendants and, early this week, Plaintiff agreed to extend the time by which Defendants Moon Mode and Chiu Pin Low would have to submit formal responses to the Interrogatories, with the understanding that Defendant would provide the full names and addresses for service for Defendants John Doe and Jane Doe by today. That has not happened.

Plaintiff respectfully asks that the Court order Defendants Moon Mode and Chiu Pin Low to respond to Plaintiff’s First Set of Interrogatories, which were originally due on November 25, 2022, by no later than December 22, 2022. Deborah Kick, of Hamra Law Group, counsel for Defendants Moon Mode and Chiu Pin Low, does not oppose this motion.

Plaintiff respectfully requests, pursuant to Rule 4(m) of the Federal Rules of Civil Procedure, that the time for service of process upon the Doe defendants be extended an additional 20 days, or until December 29, 2022. This will allow sufficient time for Plaintiff to either promptly serve the Doe Defendants upon a timely receipt of responses to Plaintiff's interrogatories, or to promptly seek the Court's intervention if Defendants Moon Mode and Chiu Pin Low do not timely respond to the interrogatories.

Thank you for your consideration of these requests.

Respectfully submitted,

/s/ Margaret McIntyre

Margaret McIntyre

Kevin S. Johnson, Esq. - by ECF only
Deborah Kick, Esq. - by ECF only
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